

BEFORE THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA

DOCKET NO. 2021-349-E

Joint Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC to Request the Commission to Hold a Joint Hearing with the North Carolina Utilities Commission to Develop Carbon Plan)))))))	PETITION TO INTERVENE OF THE ELECTRIC COOPERATIVES OF SOUTH CAROLINA, INC. AND CENTRAL ELECTRIC POWER COOPERATIVE, INC.
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Pursuant to Public Service Commission Regulation 103-825, and other applicable provisions of the Commission’s Rules of Practice and Procedure, Central Electric Power Cooperative, Inc. (“Central”) and The Electric Cooperatives of South Carolina, Inc. (“ECSC”) (jointly referred to as the “Petitioners”) hereby file this Petition to Intervene in the above-captioned proceeding. In support of this Petition, Central and ECSC state as follows:

1) Central is a not-for-profit generation and transmission electric cooperative formed under S.C. Code Section 33-49-10, *et. seq.* Central’s principal place of business and mailing address is 20 Cooperative Way, Columbia, SC 29210. Central is engaged in the purchase, transmission, and sale of electric power to twenty electric distribution cooperatives throughout South Carolina. Central’s distribution cooperative members provide electric power to over 700,000 homes, businesses, and industrial members throughout all forty-six South Carolina counties and a small portion of North Carolina.

2) ECSC is the state-wide service and trade association for electric cooperatives in South Carolina. Its members are eighteen of the twenty consumer-owned electric cooperatives, one wholesale power supply cooperative, one transmission service cooperative, and one materials supply cooperative. ECSC serves as a legal and regulatory representative of its member electric

cooperatives. Together, ECSC's members operate the largest electric distribution system in the state. More than 1.5 million South Carolinians in all forty-six counties use electricity from electric cooperatives. ECSC's principal place of business is 808 Knox Abbot Drive, Cayce, South Carolina 29033.

3) Pursuant to Rule R. 103-804(S) of the Commission's Rules of Practice and Procedure, Petitioners are represented by counsel in this proceeding:

For Central:

John H. Tiencken, Jr.
The Tiencken Law Firm, LLC
234 Seven Farms Drive, Ste 114
Charleston, South Carolina 29492
Tel. (843) 377-8415
Fax (843) 377-8419
jtiencken@tienckenlaw.com

Christopher S. McDonald
The Tiencken Law Firm, LLC
234 Seven Farms Drive, Ste 114
Charleston, South Carolina 29492
Tel. (843) 377-8415
Fax (843) 377-8419
cmcdonald@tienckenlaw.com

For ECSC:

Charles L.A. Terreni
Terreni Law Firm, LLC
1508 Lady Street
Columbia, South Carolina 29201
Tel. (803) 771-7228
Fax (803) 771-8778
charles.terreni@terrenilaw.com

Christopher R. Koon
The Electric Cooperatives
of South Carolina, Inc.
808 Knox Abbott Drive
Cayce, South Carolina 29033
Tel. (803) 739.3034
Fax: (803) 796.6064
chris.koon@ecsc.org

4) The Commission opened this proceeding on the petition of Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP") (collectively, "Duke Energy" or the "Companies"), to hold a joint proceeding with the North Carolina Utilities Commission (the "NCUC") to develop the Carbon Plan required by N.C. Gen. Stat. §§ 62-2, 62-30, Part I of Session Law 2021-165 ("HB 951").

5) Central provides wholesale power to its member-cooperatives primarily through a portfolio of contracts. The two primary contracts are with the South Carolina Public Service Authority, the state-owned utility known as Santee Cooper, and DEC.

6) The contract with DEC is referred to as the Duke Power Purchase Agreement (“PPA”). The PPA is an all-requirements contract for member-cooperative load in DEC’s balancing authority area. An all-requirements contract requires the provider to supply the purchaser with all the purchaser’s energy needs up to the level of reliability specified in the agreement. DEC provides approximately 22% of the electricity supplied by Central to its member cooperatives.

7) According to their petition “[t]he Companies are proposing the joint proceeding requested in this Petition in the interests of coordination and cooperation between the States in which they serve so that this Commission and other South Carolina stakeholders may participate in the important generation transition issues that will be addressed in the Carbon Plan. Simply put, both North Carolina and South Carolina stakeholders should have a “seat at the table” as decisions are made regarding the resources needed to meet Duke Energy’s customers’ energy needs for the next decade.” Petition, p. 2.

8) Petitioners anticipate that this proceeding will address a variety of issues directly related to their core business, including, but not limited to, wholesale and retail rates throughout the region, the availability, and pricing of future wholesale power purchases.

9) Considering the above, the Petitioners have standing to intervene in the proceeding and represent the interests of their members. Petitioners and their member cooperatives have a direct and material interest in the issues to be addressed and resolved by the Commission, and their interests cannot be represented by any other party; furthermore, Petitioners’ involvement in

these proceedings will promote the public interest by furthering the development of consistent distributed generation policies among the state's electricity providers.

WHEREFORE, Petitioners pray that they will be allowed to intervene in this docket and all related proceedings, including, but not limited to, the ability to appear as parties, engage in discovery, and participate in all hearings by offering testimony and exhibits and cross-examining witnesses. Petitioners request the receipt of all notices, documents, exhibits and data submitted by all parties and the Commission's staff.

Respectfully submitted,

s/ John H. Tiencken, Jr.

Charlie Terreni

John H. Tiencken, Jr.
 Christopher S. McDonald
 Tiencken Law Firm, LLC
 234 Seven Farms Drive, Ste 114
 Charleston, South Carolina 29492
 Tel. 843-377-8415
 Fax (843) 377-8419
jtiencken@tienckenlaw.com
cmcdonald@tienckenlaw.com

Charles L.A. Terreni
 Terreni Law Firm, LLC
 1508 Lady Street
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 Fax (803) 771-8778
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For Central Electric
 Power Cooperative, Inc.

Christopher R. Koon
 The Electric Cooperatives
 of South Carolina, Inc.
 808 Knox Abbott Drive
 Cayce, South Carolina 29033
 Tel. (803) 739.3034
 Fax: (803) 796.6064
chris.koon@ecsc.org

November 16, 2021

For The Electric Cooperatives of South
 Carolina, Inc.